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BY E-MAIL AND FEDERAL EXPRESS

Hon. Colleen McMahon
United States District Judge
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Sillam et al. v. Labaton Sucharow LLP et al.*,
S.D.N.Y. Case No. 1:21-cv-06675 (CM)

Dear Judge McMahon:

We represent defendants Labaton Sucharow LLP, Christopher J. Keller, and Lawrence A. Sucharow in this action. Plaintiffs commenced the action on August 6, 2021.

Defendants have not yet been served with the Summons and Complaint. In a letter motion filed on September 17, 2021 (ECF Docs. 7 and 8), Plaintiffs' counsel states that Plaintiffs "have requested that [counsel] refrain from service of the Complaint in this action until further notice" to allow Plaintiffs to gather evidence at a hearing they claim will take place in France on an unknown date in 2022. Plaintiffs also ask in the letter motion that the Case Management Conference scheduled for October 28, 2021 and the deadline for filing a proposed Case Management Plan be adjourned indefinitely.

Defendants oppose Plaintiffs' requests. If Plaintiffs do not wish to proceed with this action, they are free to voluntarily dismiss it under Fed. R. Civ. P. 41(a)(1)(A)(i). Otherwise, we respectfully submit that the action should proceed in the ordinary course pursuant to the Federal Rules of Civil Procedure and your Honor's Individual Rules.

Respectfully,

A handwritten signature in black ink that reads 'Mark C. Zauderer'.

Mark C. Zauderer

cc: Steven J. Czik (by ECF)
Ira Brad Matetsky, Esq.